

**Michael J. Aye, SBN 86288**  
Attorney at Law  
117 J Street, Suite 202  
Sacramento, CA 95814-2212  
Telephone (916) 447-1278

ATTORNEY FOR DEFENDANT  
Joshua Klipp

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,	)	2:14-cr-00107-TLN-1
	)	
PLAINTIFF,	)	STIPULATION AND ORDER
	)	COUNTIUNG STATUS
v.	)	CONFERENCE FROM JULY 31, 2014
	)	TO SEPTEMBER 4, 2014
JOSHUA KLIPP,	)	
	)	
	)	
DEFENDANT.	)	
_____	)	

**STIPULATION**

Plaintiff United States of America, by and through its  
counsel of record, and defendant, by and through his counsel of  
record, hereby stipulate as follows:

1. By previous order, this matter was set for status on  
July 31, 2014.

2. By this stipulation, the parties now moves to continue  
the status conference until September 4, 2014, at 9:30 a.m., and

**Stipulation and Order To Continue Status**

1 to exclude time between July 31, 2014, and September 4, 2014  
2 under Local Code T4.

3 3. The parties agree and stipulate, and request that the Court  
4 find the following:  
5

6 a. The government has represented that the discovery  
7 associated with this case includes a significant amount of  
8 electronic evidence. This discovery has been provided, or  
9 will be made available to the defense for review.

10 b. Counsel for the defendant has retained an expert to  
11 review the electronic evidence in this matter but the  
12 expert has yet to actually viewed the material and provided  
13 a report to counsel. Counsel for defendant believes that  
14 failure to grant the above-requested continuance would deny  
15 him the reasonable time necessary for effective  
16 preparation, taking into account the exercise of due  
17 diligence.  
18

19 c. The government does not object to the continuance.  
20

21 d. Based on the above-stated facts, the ends of justice  
22 served by continuing the case as requested outweigh the  
23 interest of the public and the defendant in a trial within  
24 the original date prescribed by the Speedy Trial Act.  
25

26 e. For the purpose of computing time under the Speedy Trial  
27 Act, 18 U.S.C. § 3161, et seq., the time period of July 31,  
28

2014 to September 4, 2014, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv), Local Code T4, because it results from a continuance granted by the Court at defendant's request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

Dated: 7/24/2014

\_\_\_\_\_/S/ Michael J. Aye\_\_\_\_\_  
Michael J. Aye, Attorney for  
Defendant, Aleksander Randjelovich

Date: 7/24/2014

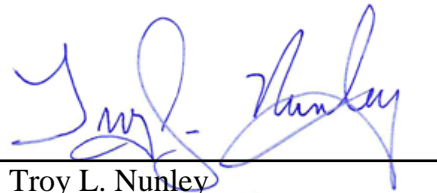
\_\_\_\_\_/S/ Kyle Reardon\_\_\_\_\_  
Kyle Reardon, AUSA, Attorney for  
Plaintiff, United States of America

IN THE UNITED STATES DISTRICT COURT FOR THE  
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UNITED STATES OF AMERICA,	)	2:14-cr-00107-TLN-1
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PLAINTIFF,	)	
	)	ORDER COUNTINUING STATUS
v.	)	CONFERENCE FROM JULY 31, 2014
	)	TO SEPTEMBER 4, 2014
Joshua Klipp,	)	
	)	
	)	
DEFENDANT.	)	
_____	)	

The parties' stipulation is approved and so ordered. The time beginning July 31, 2014, until September 4, 2014, is excluded from the calculation of time under the Speedy Trial Act. For the reasons contained in the parties' stipulation, this exclusion is appropriate to ensure effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv); Local Code T4. The interests of justice served by granting this continuance outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A).

Dated July 24, 2014

  
\_\_\_\_\_  
Troy L. Nunley  
United States District Judge